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IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Nicole Ellis :

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Debtor : CHAPTER 13

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Matrix Financial Services Corp.

Movant : Case No. 23-11995-MDC

v. : Hearing Date: 01-02-2024 at 10:30

am

Kenneth E. West, Trustee :

Respondent : 11 U.S.C. 362

:

ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

And now Nicole Ellis, by her attorney, Stephen M. Dunne, Esquire answers the request for relief from the automatic stay and avers as follows:

- 1. Admitted.
- 2. Admitted.
- 3. Denied.
- 4. Admitted.
- 5. Admitted.
- 6. Admitted.
- 7. Denied. Debtor remitted \$3,246.96 to Roundpoint Mortgage Servicing, LLC on 11/27/2023, and received a Payment Confirmation #: R2LYKLBHHN
- 8. Denied.
- 9. Denied. Debtor remitted \$3,246.96 on 11/27/2023.
- 10. Denied.
- 11. Denied.

WHEREFORE, Debtor requests that the motion for relief from the automatic stay be denied.

Respectfully submitted,

Stephen M. Dunne, Esquire /s/ Stephen M. Dunne 1515 Market Street, Suite 1200 Philadelphia, PA 19102 215-551-7109 (O)